

ASBESTOS TEM LABORATORIES, INC.

NIOSH 9002 Method Polarized Light Microscopy

Final Report

Laboratory Job #: 741-00021

1409 Fifth Street, Suite C Berkeley, CA 94710 (510) 528-0108 Phone (510) 528-0109 Fax www.asbestostemlabs.com





Mar-09-05

Mr. Howard Edwards
Ecology and Environment, Inc.
350 Sansome Street, Suite 300
San Francisco, CA 94104

Re: LABORATORY JOB # 741-00021

2 Polarized light microscopy analytical results for bulk sample(s).

Job Site: El Dorado Hills

Enclosed please find the bulk material analytical results for two samples submitted for asbestos analysis. The analyses were Performed in accordance with NIOSH 9002 for the determination of asbestos content of bulk materials by polarized light microscopy (PLM). Please note that while PLM analysis is commonly performed on bulk samples, it needs to be aware that PLM is subject to limitations. In these situations, accurate results may only be obtainable through the use of more sophisticated and accurate techniques such as transmission electron microscopy (TEM) or X-ray diffraction (XRD).

Prior to analysis, samples are logged-in and all data pertinent to the sample recorded. The samples are checked for damage or disruption of any chain-of-custody seals. A unique laboratory ID number is assigned to each sample. A hard copy log-in sheet containing all pertinent information concerning the sample is generated. This and all other relevant paper work are kept with the sample throughout the analytical procedures to assure proper analysis.

Each sample is opened in a class 100 HEPA negative air hood and analyzed following the NIOSH 9002 method. The analytical data is then compiled into standard report format and subjected to a thorough quality assurance check before the information is released to the client.

Sincerely Yours,

Yanxia Xie Lab Manager

the U.S. Government. ---

ASBESTOS TEM LABORATORIES, INC.

--- These results relate only to the samples tested and must not be reproduced, except in full, with the approval of the laboratory. This report must not be used to claim product endorsement by NVLAP or any other agency of

ASBESTOS TEM LABORATORIES, INC.

Accredited by U.S. Dept. of Commerce

CA DOHS ELAP GW/AN

Polarized Light Microscopy Analytical Report

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III olum	Tient Sample M Lab Sample M Description	Analysis	% Chrysofile	% amnhithole	% Fiberons	% Detection Analyst Analysis	Detection	Analyst	Analysis) }
	Toront Toron	Method	Asbestos	ampundar	non-asbestos	non-asbestos non-asbestos	Limit	Initials		Analyst Initials	Date
001	EDH-ZP2-022305 741-00021-001 Soil - Brown NIOSH 9002	NIOSH 9002	1-5%	1-5% (2%) Tremolite	<1%	%56) %86-06	1%	SK	03/04/2005	DV	03/04/2004
-002	Soil - Brown	EDH-ZP2-022305 741-00021-002 Soil - Brown NIOSH 9002	5-10% (8%)	5-10% (6%) Tremolite	0	%98) %06-08	1%	SK	03/04/2005	DV	03/04/2005

Lab QC Reviewer:

Analyst:

ASBESTOS TEM LABORATORIES, INC. PLM BULK SAMPLE LOGIN REPORT

LOG#: 048659

INVOICE#: 70032

ANALYSIS REQUESTED:

PLM-STANDARD

00021

URGENCY: 6-10 DAYS

DATE / Feb-24-05

CLIENT NO:

741

Total Samples:

2

TIME IN: 10:15 am

Mar-10-05 DATE /

El Dorado Hills JOB SITE:

Logged by:

JOB NO:

<u>ry</u>

CONTACT: Mr. Howard Edwards

TIME DUE:

SAMPLE CONDITIONS: EXCELLENT

LOT NO:

DELIVERED BY: FedEx S

SPECIAL INSTRUCTIONS

 $\boxtimes FAX$

415-981-0801

fredwards@ene.com

Invoice To:

See marketing screen for more info!!! -LJohnson@ene.com

REVIEWED

E-MAILED

CL#-LOT-SAMP

CLIENT#

DESCRIPTION

741-00021-001

EDH-ZP2-022305

741-00021-002

EDH-ZP3-022305

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POLARIZED LIGHT MICROSCOPY: DATA SHEET

						MACROSCOPIC PROPERTIES:	ROPERTIES:			
ASBESTOS TEM LABORATORIES						Homogeneity: Low	Low Mod.		High	
Labi.D.# 741-21-1		Job Site: EL	EL JORADO HILL	A70	王乙	Friable:	Non-friable:			
Client I.D.# EDH-7P2 -022305		Location:				Texture:	Powdera			
Description:			REIGH			Macroscopic est. of % asbestos:	of % asbestos:		2-107	
Optical Properties Of Fibrous Constituents:		Def.		1	ال الله الله		_		. <u> </u>	
Morphology	Pleochroism	Perp./Parall.	Birefr.	Angle	Elong.	Properties	% Asbestos		% Ash	Asbestos
Wavy fibers and bundles with splayed clear	None	845-1=N 4=1-548	7	P	+	Dis Stain. Color 7-7 blue 8 : Red-Purple		-0	1-5 Chrysotile	a)Host
Straight blades clear	None	r=1-627 d=1-619	ユ	T 0-10	+	D.S.C Y=Blve/Dange A=Yellow		20	1-5 Tren (2)	Tremolite
Non-fibrous material I.D.: Oucurts, opaque,	aque, Olher	m.p.				01-5	% ASBESTOS	ros Bestos	% ASBESTOS % Non-Asbestos, fibrous	
Comments:						30-05	% NON-FIBROUS	FIBROUS	.	
h:\excel\datashts\pilmdata.xls						Date:	03/04/05	50,		

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							MACROSCOPIC PROPERTIES:	ROPERTIES	;;	. •	
ASBESTOS TEM LABORATORIES							Homogeneity:	Low	Mod	High	
Labl.D.#. 741-21-2			Joh Site: El	DO,	EI DORMO HIUS	37TK	Friable:	Non-friable:			1
Client 1.D. #. 6-DH-203-	022305	Ź	Location:				Texture:	Powlery	ר האיש		
Description:			Color:	Reign,			Macroscopic est. of % asbestos:	of % asbes		3	10-20%
				}							
Optical Properties Of Fibrous Constituents:	ıts:					· · · · · · · · · · · · · · · · · · ·					
Morphology	1	Pleochroism	Ref. Index Perp./Parall.	Birefr.	Ext. Angle	Sign of Elong.	Other Properties	~*	Non- Asbestos	*	Asbestos
would finers and clear	OW.	None	4=1-548	J	Ф	+	DS.C r= bhe d=redpurple			5-10	5-10 Chryschile
stranglit fibers" Clean and heedles	w	None	619-1 = b	Ţ	T	+	7-5.C r=Bive, Orange. A=Yellow			65.70	Themo hit
Non-fibrous material I.D.: Month	, opaqu	opaque, Other m.	0 ~ 0				10-20	% %	% ASBESTOS	1011 1011	SIIG
Comments:							80-90		% NON-FIBROUS		
h:\excel\datashts\plimdata.xls							Date	Date: 03/04/05	705		

Traf 11054	Signature: Date:							hilaycall dataehtelnimdata yle
% NON-FIBROL	40-1814							Comments:
% NON.ASBES						0	-	
% ASBESTOS	2-(0%				600	rugs, Amply	172, Mise de	Non-fibrous material I.D.:
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		+	6.911qvi	£ , ~	110.1.61B	None	Finkt Colorles	needles straight to reduce
								>
		+		4 Moch	4551 : 10TH	Vone.	colorlas	may fibus
Non-	Other Properties	Sign of Elong.	Ext. r. Angle	Birefr.	Ref. Index Perp./Parall.	Pleochroism	Color	Morphology
			•				s Constituents:	Optical Properties Of Fibrous Constituents
() asbestos:	Macroscopic est. of % asbestos:	*	સ્	30 142	Color:		r material	Description: <- 1-000
Ps walny -	Texture:				Location:	LL 305	9-182	Client I.D. #. EDH —
Low Mod.	romogenety; Friable:	Hills	El Derado Hills	(Jo,	Job Site:			Lab.1.0.# $741-21-1$
OPERTIES:	E-1							
	TA SHEET	OPY: DA	AICROSC	LIGHT N	POLARIZED LIGHT MICROSCOPY: DATA SHEET			

1-5% chrysotile

Asbestos

High

1-5% Tremolite

% NON-ASBESTOS, FIBROUS

% NON-FIBROUS

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(510) 528-0109 Phone
(510) 528-0109 Fax

VSBESTOS TEM LABORATORIES, INC.





Accredited by
U.S. Dept. of Commerce

CA DOHS ELAP

Attachments

- 1. Client COC form
- 2. Laboratory Sample Login Sheet
- 3. Analyst Raw Data Sheets
- 4. QC Analyst Raw Data Sheets

ENVIRONMENTAL PROTECTION AGENCY
Office of Enforcement

San Francisco, California 94105 75 Hawthorne Street CHAIN OF CUSTODY RECORD

REGION O

Der Received by: (Signature) Received by: (Signature) partormed REMARKS Date / Time Date / Time Remarks Relinquished by: (Signature) Relinquished by: (Signature) Date /Time 12/2012 759 50 750 750 Distribution: Original Accompanies Shipment; Copy to Coordinator Field Files TAINERS CON Š. OF Received for Laborator by: (Signature) 2/24/05 10:15AM ATEM/RUACLIS Date / Time | Received by: (Signature) Received by: (Signature) EDH-2P3-022305 EDH-2P2-022305 STATION LOCATION Hills Howard Date / Time Date / Time 18/1 solecit erado **BARD** PROJECT NAME j COMP Relinquished by: (Signature) Relinquished by: (Signature) 1345 Relinquished by: (Sign) Aura 777 TIME 1400 SAMPLERS: (Signature) 02/23/6 02/23/65 DATE PROJ. NO. STA. NO.

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ecology and environment, inc.

350 SANSOME STREET, SUITE 300, SAN FRANCISCO, CALIFORNIA 94104, TEL. (415) 981-2811
International Specialists in the Environment

SCOPE OF WORK Region IX START

El Dorado Hills Naturally Occurring Asbestos Project

Performance Evaluation Soil Analysis by PLM and TEM

PAN: 001275.0440.01TA TDD Number: 09-04-0-0011

1.0 GENERAL

Ecology and Environment, Inc., (E & E), with a business office located at 350 Sansome Street, Suite 300, San Francisco, California 94104, has entered into a contract (Contract No. 68-W-01-012) with the U.S. Environmental Protection Agency (US EPA) to procure as needed various analytical services.

The US EPA has directed E & E to analyze two soil performance evaluation (PE) samples. The performance evaluation samples were developed by a contractor for the US EPA Region 9 Quality Assurance Office.

2.0 ANALYTICAL REQUIREMENT

2.1 PURPOSE OF ANALYSIS

E & E will submit the (PE) samples for analysis. The specific analysis parameters required are indicated in sections 2.2, 2.3, 2.4, 3.0 and 4.0. The data will be used by the US EPA as part of a PE study of asbestos in soil.

2.2 SPECIFIC PROJECT REQUIREMENTS

All laboratory services will be provided by the E & E contracted laboratory with no sub-contracting of analyses allowed. Air samples will be initially analyzed for asbestos fibers following NIOSH 9002, Asbestos by Polarized Light Microscopy. If asbestos is not detected

sample at a concentration of greater or equal to 1 percent by area following NIOSH 9002, then the sample will be further analyzed by Transmission Electron Microscopy following EPA 600/R-93/116, Method for the Determination of Asbestos in Bulk Building Materials Method.

Specific project requirements and specifications for the method are listed in Table 2-1, Table 2-2 and Table 2-3. Other required specification are described in sections 3 through 5 of this SOW

To insure quality for the analytical project the following measures are required:

- All analyses will be conducted by a NVLAP-certified laboratory for the analysis of asbestos fibers.
- The laboratory must provide documentation of successful proficiency in detection of "Libby amphibole" asbestos.
- The laboratory must conduct zone axis patterns measurement and quantitative EDS chemistries for identification.
- The laboratory will have previous experience in the determination of chrysotile, regulated amphibole asbestos fibers in soil by the specified NIOSH and EPA methodologies.
- The laboratory will have previous experience in the determination and reporting of non-regulated amphibole by PLM and TEM.
- The laboratory will have previous experience with providing detailed analytical documentation of analysis to support US EPA projects.
- Analytical precision will be documented with duplicate and replicate analyses.
- The laboratory must willing and able to provide technical assistance to START project management regarding analysis prior to and after generation of data.

2.3 TURNAROUND TIME

Sample data turnaround for PLM and TEM data is 10 days from sample receipt. The report turnaround requirements for samples are specified in Table 2-2. Turnaround times for Data packages is also specified in Table 2-2.

2.4 ANALYTICAL PROTOCOL REQUIRED

Samples for PLM analysis are to be analyzed, documented, and reported as specified in the NIOSH 9002 and this SOW. Samples for TEM analysis are to be analyzed, documented, and reported as specified in the *EPA 600/R-93/116* method and this SOW. Any modifications to these protocols should be specified and approved prior to acceptance of project. Protocol, procedures and parameters not discussed in the method or specified in this SOW should be addressed in the laboratory Standard Operating Procedure (SOP) for PLM analysis NIOSH 9002 and by TEM analysis by *EPA 600/R-93/116*.

	Table 2-1 Summary of Samples to be Co	
Method:	NIOSH 9002, Asbestos by Polarized Light Microscopy	EPA 600/R-93/116, Method for the Determination of Asbestos in Bulk Building Materials Method.
Sample Container:	Prepared sample mass ranging fro	om 5 to 10 grams.
	Number of Samples	Number of Samples
	2 PE Samples	2 PE Samples

Table 2-2 Analytical Requirements for El Dorado Hills Naturally Occurring Asbestos

Each samples will be dried, milled, sieved and packaged in a seal bag with custody documentation.

Sample collection dates: October 2004

Sample delivery date: February 20

Method	Specification	Turnaround Times
NIOSH 9002, Asbestos by Polarized Light Microscopy	-Detection Limit: 1 % -Screening level: 1 %	Final Data Report: Samples: Within 10 working days of receipt. Data Package: All Samples: Within 10 working days of final report.
EPA 600/R-93/116, Method for the Determination of Asbestos in Bulk Building Materials Method.	-Preparation and analysis of samples that have PLM concentration less than 1%. -Detection Limit: 0.0025% by weight -Aspect Ratio: All asbestos structures with an aspect ratio greater than or equal to 3:1 will be counted irrespective of length. -Identification of fibers.	Final Data Report: Samples: Within 10 working days of receipt. Data Package: All Samples: Within 10 working days of final report.

Table 2-3

For TEM Analysis only

Analytical Requirements per Each Sample for El Dorado Hills Naturally Occurring Asbestos

Mineral Identification of Representative Structures

- Identification of asbestiforms shall include the following:

<u>Regulated</u> - tremolite, anthophyllite, actinolite, crocidolite, amosite and chrysotile

<u>Other amphibole asbestiforms</u> - winchite, richterite, ferro-edenite, magnesio-arfvedsonite, and magnesio-reibeckite

Non-Asbestos <u>Material</u>- all other mineralogy

Structure Classification for Each Structure

Dimensions for Each Structure

Counting

(All structures with aspect ratio of greater than or equal to 3:1)

Counted structure shall include the following:

Regulated - tremolite, anthophyllite, actinolite, crocidolite, amosite and chrysotile

Other amphibole asbestiforms - winchite, richterite, ferro-edenite, magnesio-arfvedsonite, and magnesio-reibeckite

Primary Structure Counts (Irrespective of Length). Structures with Lengths Greater than 5 μ m. Fibers and Bundles with Lengths Greater than 5 μ m.

Calculations

Counted structure shall include the following:

Regulated - tremolite, anthophyllite, actinolite, crocidolite, amosite and chrysotile

Other amphibole asbestiforms - winchite, richterite, ferro-edenite, magnesio-arfvedsonite, and magnesio-reibeckite

Asbestos Structures Per Square Millimeter
95 % Confidence Interval for Each Reported Concentration

Parameters

Analytical Sensitivity Grids Opened Area of Filter Analyzed Total Filter Area

3.0 QUALITY ASSURANCE/QUALITY CONTROL REQUIREMENTS

Method-specific quality assurance/quality control (QA/QC) requirements specified in the PLM and TEM methods are to be followed with the following specifications.

The following replicate and duplicate analyses are required for all samples analyzed by TEM:

Replicate Analysis:	New grids counted by same analyst:	% 5
Replicate Analysis:	New preparation by same analyst:	% 5
Duplicate Analysis:	Same grids recounted by different analyst:	% 5
Duplicate Analysis:	New grid counted by different analyst:	% 5
Duplicate Analysis:	New preparation by different analyst:	% 5

Other QA/QC requirements should include analysis of a laboratory control standard, process blanks and filter blank with each group of samples. A determination of a blind internal laboratory control sample by the analyst during the analysis phase of this project is recommended. However, if this is not practical, documentation of the primary analyst performance results from the most recent quarterly inter-laboratory performance verification may be substituted in lieu of a laboratory control sample. The quality assurance limits used to evaluate the QA/QC samples must be indicated with quality assurance data reporting.

The laboratory is expected to adhere to standard laboratory practices when analyzing samples and documenting results. Questions concerning specific sample analyses should be addressed prior to analysis of samples. If the laboratory has any questions or problems concerning the analysis of received samples, E & E should be notified immediately by phone, followed by a letter in hard copy that discusses the problem(s) and associated resolution(s). All correspondence between the laboratory and E & E should be documented in the data package. If established QC limits are exceeded, appropriate actions must be taken to correct or address the problem. Re-analysis of the affected samples is required for all non-matrix related problems.

4.0 DELIVERABLES REQUIREMENTS

Samples analyzed by the laboratory for this project will require the following deliverables:

- Final data report
- Complete data package

4.1 FINAL DATA REPORT

The final data report may be reported either in a summary table or on individual sample sheets. Reports must be signed and should either be hard copies sent by mail or image files sent by e-mail or mail. The data should be clearly identified as being final. All QC summary information must be included.

The following data is required in the final report for PLM analyses:

Narrative on conditions of sample, method, counting rule, and summary of any quality assurance or quality control problems encountered during analysis.

For each PLM sample and all PLM QC samples include client sample name, laboratory identification number, appearance, % fiberous non-asbestos, % non-fiberous non-asbestos, % chrysotile asbestos, % amphibole asbestos, analytical sensitivity, analyst, and analysis date.

The following data is required in the final report for TEM analyses:

For each TEM sample and all TEM QC samples, include client sample name, laboratory identification number, analytical sensitivity, grids opened, filter area, area analyzed, analyst, and analysis date.

For each <u>regulated asbestiform</u> include the following: primary structures in weight percent, primary structures > than 5 μ m in length in weight percent, asbestos fiber and bundles > 5 μ m in length in weight percent, 95 % confidence interval.

For each other amphibole asbestiforms include the following: primary structures in weight percent, primary structures > than 5 μ m in length in weight percent, asbestos fiber and bundles > 5 μ m in length in weight percent, 95 % confidence interval.

For each sample and all QC samples, include the TEM Asbestos Fiber Count-Raw data information table. This table should include for each grid, the grid number, grid coordinates, primary and total structures, lengths, width, structure type, and asbestos type.

4.2 COMPLETE PROJECT DATA PACKAGE

The final data package may be reported either as a compilation of printed data or as a compact disk-read only memory (CD-ROM) with image files that are a facsimile of the printed data package. The image file should be in portable document format (pdf).

The data package shall include all copies of the original documentation generated in support of a method performed under the contracted Statement of Work. The data packages will be used to demonstrate and document that all requirements of the method have been met. The data packages will be used to support US EPA decisions and cost recovery efforts. Data and data packages may be used to support US EPA civil enforcement activities. The documentation includes, but is not limited to, sample tags, custody records, shipping information, standard preparation records, sample preparation/extraction records, and sample analysis record including printouts and copies of log pages or copies of log sheets. The laboratory must maintain all original information and documentation required in the data package for five years. All related method records in permanently bound notebooks and all related computer files must also be maintained for five years. Otherwise, the laboratory must provide original documents and files in the data package rather than copies.

The following deliverables are required in the data package. The following data requirements are included to specify and emphasize general documentation requirements and are not intended to supercede or change the requirements of each method.

- Raw data (to support all summary data) should include the following:
 - 1. Copies of all analysis preparation sheets.
 - 2. Copies of all analyst count sheets.
 - Copies of all information necessary to calculate data reported in the final data report.
- Pages within the final data report and data validation package will be numbered sequentially.
- A copy of the laboratory's certification for TEM analysis must be included with data validation package.

5.0 ADDITIONAL REQUIREMENTS

All samples and prepared materials related to the samples must be held for six months. Prior to disposal of any sample, E & E must be notified and may require that the samples be returned to E & E at E & E cost.

Disposal of samples and sample containers must be in compliance with local, state, and federal regulations and will be the responsibility of the laboratory. Disposal cost must be included in the price of analysis.

The data package will be independently validated within two months of package receipt. The laboratory will likely be contacted during the validation process to clarify any discrepancies or problems. The laboratory will perform corrective action as required. All post sampling costs related to validation and corrective actions must be included in the price of analysis.

All hard and electronic data generated in relation to E & E projects must be archived for five years.

Audits may be performed by E & E or the US EPA Quality Assurance Office. Performance Evaluation samples may be submitted to the laboratory at any time.

All work must be performed by the contract specified laboratories.

Howard Edwards
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(415) 981-0801 FAX
Hedwards@ene.com



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

FACSIMILE

Mark Bailey Laboratory Director Asbestos TEM Laboratory Berkeley, California

Dear Mr. Bailey:

I am writing to provide formal notification of results of two recent asbestos containing performance evaluation (PE) samples analyzed by PLM and TEM by Asbestos TEM Laboratory, and reported on March 9, 2005. The PE samples contained Chrysotile, and Tremolite in soil at approximately 0.5% in one PE and approximately 2% in the second PE.

Asbestos TEM performed well on the analyses. The fibers were correctly identified. There is some consistent overestimation, however, the results are considered to be within an acceptable range.

Please contact me 415-972-3802 if you have any questions.

Sincerely,

Stephen E. Remaley

Chemist/Regional Contract Lab Program Project Officer

415-972-3802

FAX TRANSMIT	TAL	# of pages ►
Lisa Thusan	From)	malen
PL E	Phone #	-677 07827
ax II	Fax #	

Preparation of Soil Samples Quantitatively Mixed with Tremolite and Chrysotile Asbestos

Equipment and Materials

- NIST SRM Tremolite Asbestos
- NIST SRM Chrysotile Asbestos
- Local soil from Chatham County, NC
- Multi-speed blender
- Stirring utensils
- Metal drying pans
- Ultraviolet drying lamps
- Hot plate

Two batches of asbestos in soil were created; one batch contained 0.5% each of chrysotile and tremolite, and the other contained 2% each of chrysotile and tremolite. A total of one hundred grams was the target weight for each of the two sample batches. For the sample concentration of 0.5%, 99 grams of dried soil was weighed, and 0.5 grams of each asbestos SRM was weighed for mixing. In the case of the 2.0% concentration sample, 96.0 grams of dried soil was used and 2.0 grams each of the two asbestos types were weighed for mixing.

Once all components were weighed, 8 oz. of distilled water was poured into the blender jar and the two asbestos types were mixed on the highest setting for 30 seconds, the soil was then added and the components were blended together for another 45 seconds for the 0.5% concentration and another 60 seconds of blending for the 2.0% sample. Each of these wet mixtures was then poured into a drying pan and labeled as to their asbestos concentration and dried under heat lamps and on hot plates until completely dry.

The materials were then packaged into plastic vials and labeled according to their concentration. Aliquots from each vial were used to make quantitation slides for visual estimates and for point count slides. The results of quantitation are shown below.

Quantitation of Asbestos/Soil Mixtures				
Concentration	Visual Estimate Result	Point Count Result		
0.5% Chrysotile +	0.47% Chrysotile	1.4% Chrysotile		
0.5% Tremolite	0.59% Tremolite	1.2% Tremolite		
2% Chrysotile +	1.85% Chrysotile	4.7% Chrysotile		
2% Tremolite	2.92% Tremolite	3.9% Tremolite		

Thickness differences between the soil matrix particles and the asbestos bundles are speculated to have caused the biased high results on the point counts.

Production date: October 6, 2004

Produced for: Steve Remaly, Region 9 USEPA, telephone 415-972-3802, email

Remaley.Steve@epamail.epa.gov

Produced by: Owen Crankshaw, RTI International, P.O. Box 12194, Research Triangle Park, NC,

27709, telephone 919-541-7470, email osc@rti.org